IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:))
210 LUDLOW STREET CORP.,) Case No. 10-11850-TPA
Debtor.))
210 LUDLOW STREET CORP.,) Chapter 11)
Movant.))) Doc#
v. NO RESPONDENTS))

MOTION FOR JOINT ADMINISTRATION OF CHAPTER 11 CASES

AND NOW COMES 210 Ludlow Street Corp. (the "Debtor"), the debtor and debtor in possession (the "Debtor"), by and through its proposed attorneys, Blumling & Gusky, LLP, and files the following Motion for Joint Administration of Chapter 11 Cases:

- 1. On October 8, 2010, Voluntary Petitions for Relief under Chapter 11 of the United States Bankruptcy Code were filed by 210 Ludlow Street Corp. ("210 Ludlow") and Warren Motel Associates ("Warren Motel").
 - 2. 210 Ludlow is a Pennsylvania Corporation.
 - 3. Warren Motel is a Pennsylvania Limited Partnership.
- 4. Pursuant to Federal Rule of Bankruptcy Procedure 1015(b), if two or more petitions are pending in the same court by or against, <u>inter alia</u>, a debtor and an affiliate, the court may order joint administration of the estate. F.R.B.P. 1015(b).
- 5. Pursuant to §101(2)(D) of the Bankruptcy Code, 11 USC §101(2)(D), the term affiliate means an entity that operates the business or substantially all of the property of the debtor under a lease or operating agreement.

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6. Warren Motel and 210 Ludlow are affiliates within the meaning of \$101(2) of the Bankruptcy Code, because 210 Ludlow Corp. operates substantially all property

of Warren Motel Associates under the terms of a lease.

7. For ease of administration, and in order to avoid confusion, it is in the best

interest of the Debtor, its creditors and the estate if the cases of Warren Motel and 210 Ludlow

were consolidated for administrative purposes only, with the filing of all pleadings and other

documents, exclusive of proofs of claim, to be filed at the case number of 10-11850.

8. This Motion is not a request for, and should not be construed as a request

that the cases of Warren Motel and 210 Ludlow be substantively consolidated.

WHEREFORE, the Debtor requests that this Court enter an Order for the Joint

Administration of the Chapter 11 cases of Warren Motel Associates and 210 Ludlow Street

Corp., at the case caption and number of 10-11850.

Respectfully submitted,

BLUMLING & GUSKY, LLP

Dated: October 11, 2010

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PROPOSED ATTORNEYS FOR DEBTOR AND DEBTOR IN

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